

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 20, 1999

Margit Aramburu, Executive Director
Delta Protection Commission
14215 River Road
P.O. Box 530
Walnut Grove, CA 95690

Subject: Gas Pipelines Under Peat Soils of the Delta

Dear Ms. Aramburu:

Thank you for your letter of August 20, 1999, in which you ask if there is any policy or program to help eliminate a hazard created when buried gas pipelines eventually resurface in high water content soils beneath agricultural areas which are mechanically tilled.

As you may already be aware, existing Federal safety regulations adopted by this Commission prescribe the minimum depth and coverage for gas pipelines at the time of construction. Moreover the pipeline locations are marked with distinctive signs. The pipeline owner should be contacted via the Underground Service Alert system whenever plans to conduct digging of any sort could result in contact with the buried lines. The pipeline owner will mark the line location along its length. Typically, if damage occurs in such a situation and the party breaking ground has not first advised the utility then liability tends to rest with that party.

To date it appears that no regulations clearly apply. Under the circumstances and soil conditions you describe, other explanations for the problem are possible. The pipeline, while meeting the minimum requirements for depth of burial initially, may have been bored or installed at too shallow a depth to prevent conflict with existing or possible future uses of the surface above the pipeline. Other possibilities include lack of anchoring initially or in retrofit, or of periodic maintenance.

Commission staff working in several areas including safety and maintenance of utility facilities will contact you in the near future to further investigate a resolution of this matter. Meanwhile you may contact Brian Schumacher of our Energy Division if you wish to discuss this matter further. He may be reached preferably by email at bds@cpuc.ca.gov or by telephone at 415/703-1226.

Yours truly,

A handwritten signature in cursive script that reads "Wesley M. Franklin".

Wesley M. Franklin, Executive Director

Cc: Paul Clanon
Brian Schumacher
William Schulte
Mahendra Jhala
Judith Ikle